

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

Ashton, et al. v. The Kingdom of Saudia Arabia, 17-cv-2003 (GBD)(SN)

**DECLARATION OF DOROTHEA M. CAPONE, ESQ.
IN SUPPORT OF *BAUER* PLAINTIFFS' MOTION TO CORRECT**

I, DOROTHEA M. CAPONE, ESQ., pursuant to 28 U.S.C. § 1746, hereby state under penalty of perjury that:

1. I am the attorney representing a subset of Plaintiffs in Ashton v. Kingdom of Saudi Arabia, Civil Action No. 17-cv-2003 (GBD)(SN) ("*Ashton* KSA action"), referred to herein as the *Bauer* Plaintiffs in the above-referenced matter, and I submit this Declaration in support of the *Bauer* Plaintiffs' Rule 60(a) Motion to Correct certain Plaintiffs' names.

2. During an administrative review of the list of electronic filers in the Court's ECF system, we noted that the last names of certain Plaintiffs has changed due to a change in their marital status. These changes occurred after the filing the *Ashton* KSA action. These Plaintiffs are identified on the Exhibit to this Declaration.

3. The corrections requested by *Bauer* Plaintiffs are simply clerical in nature and will not in any way change the Court's disposition of this case. Fed. R. Civ. P. Rule 60(a) applies primarily to errors or omissions committed by an attorney or the court which are not apparent on the record. See *In re Merry Queen Transfer Corp.*, 266 F. Supp. 605 (E.D.N.Y. 1967).

4. For the foregoing reasons, *Bauer* Plaintiffs respectfully request that the Court grant the within motion and allow Counsel for *Bauer* Plaintiffs to enter the correct names into the Court's ECF system so that said Plaintiffs may be properly identified during the electronic filing process of any documents in the *Ashton* KSA action.

Dated: New York, New York
July 7, 2022

/s/ Dorothea M. Capone

Dorothea M. Capone